

Exhibit A

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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KPM ANALYTICS NORTH AMERICA CORPORATION,

Civil Action No.

Plaintiff, 21:-10572

- v. -

BLUE SUN SCIENTIFIC, LLC, THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD., ARNOLD
EILERT, MICHELLE GAJEWSKI, ROBERT GAJEWSKI,
RACHAEL GLENISTER, GREGORY ISRAELSON, IRVIN
LUCAS AND PHILIP OSSOWSKI,
Defendants.

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30(b)(6) DEPOSITION

VIA ZOOM VIDEOCONFERENCING

OF

KPM ANALYTICS NORTH AMERICA CORPORATION

BY AND THROUGH

ERIC OLSON

Wednesday, July 7, 2021

Reported By:

LINDA J. GREENSTEIN

JOB NO. 4695539

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2 conveyer trying to determine the amount of
3 water that's in the sample.

4 There are other attributes that
5 can be done with that system as well, but
6 primarily it is for moisture monitoring.

7 Q. Do the spectrometers offered by
8 Blue Sun or the services offered by Blue
9 Sun compete with that industry at all?

10 A. My understanding from the
11 website of Blue Sun is there is a similar
12 product offered for sale through Blue Sun.

13 Q. What is that product?

14 A. I don't recall the name of it.

15 Q. Could you name the other
16 companies that are within the KPM family of
17 companies?

18 A. Is that a question, sorry?
19 Could you restate it if it was?

20 Q. Yes. Can you name the other
21 companies that are within the KPM family of
22 companies?

23 A. By brand or legal entity is
24 quite complex, but by brand or end product,
25 the easiest way to explain is we have

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2 Sightline Process Control, we have AMS, we
3 have EyePro Systems, Chopin Technologies,
4 Sensor Tech Systems, Process Sensors, Unity
5 Scientific.

6 Q. Did all those companies become a
7 member of KPM by KPM's acquisition of those
8 companies?

9 MR. MAGEE: Objection.

10 You could answer.

11 A. That is my understanding.

12 Q. Can you give me a time frame
13 over which those acquisitions happened?

14 A. The Process Sensors, Unity
15 Scientific and Chopin Technologies were all
16 about 2015.

17 I believe AMS came shortly
18 thereafter. It may have even been part of
19 that -- no, it came after. Followed by
20 Sensor Tech Systems, Sightline and EyePro
21 Systems.

22 Q. Who is Union Park Capital?

23 A. Union Park Capital is a private
24 equity firm.

25 Q. And what was their role, if any,